



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 17, 2019

BY ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Richard Gaffey and Harald Joachim von der Goltz*, 18 Cr. 693 (RMB)

Dear Judge Berman:

The Government respectfully submits this letter, with the consent of defense counsel, to respectfully request an extension to file its opposition to the Defendants' Motion for a Bill of Particulars (Dkt. No. 59) (Apr. 11, 2019), which is presently due on April 23, 2019 (*see* Dkt. No. 66). The Government requests an extension until May 2, 2019 to respond.

The Government requests this brief extension to file its opposition for two reasons. First, the Government has been engaging in discussions with the defendants in an effort to provide to them additional information relevant to their requests. Accordingly, additional time would allow for the Government to continue these discussions and provide certain information that will likely obviate certain specific requests for particulars. Second, the undersigned will be leaving the U.S. Attorney's Office on April 26, 2019, and AUSA Thane Rehn is out of the office until the week of April 29, 2019. Accordingly, an approximately week-long extension, until May 2, 2019, would allow for the Government to respond upon the return of AUSA Rehn.

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A proposed endorsement for the Court's consideration is below.

Respectfully submitted,

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United States Attorney for the
Southern District of New York

By: /s/ Sarah E. Paul
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cc: Defense Counsel (by ECF)

ENDORSEMENT:

On consent of the Defendants, the Government's request for an extension to respond to the Defendants' Motion for a Bill of Particulars (Dkt. No. 59) by May 2, 2019 is hereby GRANTED.

SO ORDERED.

Date: April ____, 2019
New York, New York

HONORABLE RICHARD M. BERMAN
UNITED STATES DISTRICT JUDGE